

SHAFIGHEH KOUBLANI,

Plaintiff,

-vs-

COCHLEAR LIMITED AND COCHLEAR
AMERICAS,

Defendants.

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2:20-cv-01741-DRH-AYS
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Oral Argument
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Requested
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X

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated September 18, 2020; the Declaration of Lauren S. Colton, dated September 18, 2020 and the exhibits annexed thereto; and all other pleadings and papers heretofore filed and served in this action, defendant Cochlear Americas Corporation (“CAM”) by their undersigned counsel, hereby move this Court, before the Honorable Denis R. Hurley, United States District Judge, at the United States District Court for the Eastern District of New York, Long Island Courthouse, located at 100 Federal Plaza, Central Islip, New York, 11722, at a date and time to be set by the Court, for an order, pursuant to Federal Rules of Civil Procedure 12(b)(6) dismissing with prejudice the Amended Complaint, dated July 14, 2020, filed by Plaintiff Shafigheh Koublani, and all claims therein asserted against CAM.

Dated: September 18, 2020
Baltimore, Maryland

Respectfully submitted,

HOGAN LOVELLS US LLP

By: /s/ Lauren S. Colton

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